

MINNESOTA OFFICE  
CANADIAN PACIFIC PLAZA  
120 S. 6TH ST., STE 2600  
MINNEAPOLIS, MN 55402



CALIFORNIA OFFICE  
600 W. BROADWAY  
SUITE 3300  
SAN DIEGO, CA 92101

DANIEL J. NORDIN  
[dnordin@gustafsongluek.com](mailto:dnordin@gustafsongluek.com)  
TEL (612) 333-8844 • FAX (612) 339-6622  
MINNESOTA OFFICE

December 1, 2022

**VIA ECF**

The Honorable Denise Page Hood  
United States District Judge  
U.S. District Court  
Eastern District of Michigan  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd., Room 251  
Detroit, MI 48226

**Re: *The Shane Grp., Inc., et al. v. Blue Cross Blue Shield of Mich., et al.*,  
Case No. 2:10-cv-14360-DPH-MKM**

Dear Judge Hood:

I write on behalf of the Class Plaintiffs in the above-captioned action regarding the letter written by Dale Schubert and filed on October 28, 2022, (ECF No. 407), and in follow-up to the letter Class Plaintiffs submitted on November 4, 2022, regarding the same (ECF No. 408). The Settlement Administrator has thus far been unable to reach Mr. Schubert but will continue to attempt to do so. There is still opportunity for Mr. Schubert to cure defects in his mother's claim, but Mr. Schubert's non-responsiveness is no reason to delay the claims process for the entire Class.

Counsel for Class Plaintiffs sent their November 4, 2022, letter to the Court to Mr. Schubert via Certified Mail the same day it was filed. On November 28, 2022, counsel for Class Plaintiffs received a letter from Mr. Schubert dated November 19, 2022 (attached as Exhibit 1). In this letter, Mr. Schubert stated:

United States Postal Service "Informed Delivery" has notified me that you are attempting to send a certified letter to my address. Be advised that my agent is not authorized to accept certified mail on my behalf.

The Honorable Denise Page Hood

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If you will re-send your communication by First Class Mail it will be forwarded to me for consideration and reply.

Though Mr. Schubert provided no reason for not accepting certified mail, Class Plaintiffs re-sent their letter, via First Class Mail on November 28, 2022, pursuant to Mr. Schubert's request.

As explained in the Declaration of Michelle La Count (attached as Exhibit 2), in an effort to help Mr. Schubert perfect his mother's claim, the Settlement Administrator attempted to reach Mr. Schubert by phone on October 31, 2022, and November 2, 2022. Mr. Schubert did not answer either time and voicemails were left stating that the Settlement Administrator was calling about this case and providing Ms. La Count's phone number for him to call. In another effort to help Mr. Schubert with his mother's claim, the Settlement Administrator sent letters via First Class Mail to Mr. Schubert's P.O. box on November 2, 2022, and November 29, 2022. Mr. Schubert has not yet responded to any of the Settlement Administrator's attempts to contact him.

The Settlement Administrator has attempted to contact Mr. Schubert multiple times via multiple methods. If Mr. Schubert chooses to engage with the Settlement Administrator in a timely manner, there is still opportunity for him to cure any defect with his mother's claim. If Mr. Schubert chooses not to so engage, processing of claims for the entire Class should not be halted solely due to the choice of one individual.

We are available to answer any questions the Court may have.

Sincerely,

GUSTAFSON GLUEK PLLC

/s/ Daniel J. Nordin

Daniel J. Nordin

DJN/jlh

Cc: All Counsel of Record (via ECF)  
Dale Schubert (via USPS First Class Mail)